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FEDERAL COMMUNICATIONS COMMISSION  
GPO: 1997 OMB: 1465-0001  
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By Hand

William F. Caton, Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

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HOWARD J. BRAUN  
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Re: WAOW-TV, Wausau, Wisconsin  
WYOW(TV), Eagle River, Wisconsin  
MM Docket Nos. 91-221, 87-8, 94-150  
92-51 and 87-154

Dear Mr. Caton:

Our client, Shockley Communications Corporation ("Shockley"), is the licensee of Station WAOW-TV, Wausau, Wisconsin, and is the brokering party to a Time Brokerage Agreement ("TBA") with Northwoods Educational Television Association ("Northwoods"), permittee of Station WYOW(TV), Eagle River, Wisconsin.

On behalf of Shockley, this is to respond to the Commission's Public Notice, DA 97-1246, released June 17, 1997 ("Public Notice"), requesting parties to existing television local marketing agreements or TBAs to submit certain factual information regarding the terms and characteristics of such agreements. As per the Public Notice, the original and four (4) copies of this information is being submitted as follows:

1. For the brokering and brokered stations, the licensee name, call letters, channel number and community of license.

### Brokering Station

<u>Licensee</u>	<u>Call Letters</u>	<u>Channel No.</u>	<u>Community of License</u>
Shockley Communications Corporation	WAOW-TV	9	Wausau, WI

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Brokered Station

<u>Permittee</u>	<u>Call Letters</u>	<u>Channel No.</u>	<u>Community of License</u>
Northwoods Educational Television Association	WYOW(TV)	34	Eagle River, WI

2. Name/rank of the Nielsen Designated Market Area(s) where the brokering and brokered stations are located:

Wausau/Rhineland, Wisconsin/No. 135.

3. The existence and degree of any signal contour overlap between the brokering and brokered stations:

The Grade B signal contour of WAOW-TV overlaps 31% of the Grade B signal contour of WYOW. There is no Grade A signal contour overlap between the stations.

4. Date on which the parties entered into the TBA:

May 9, 1996.

5. Information regarding TBA terms.

a. Start and end dates of initial term: The initial term of the TBA began on May 9, 1996, and is effective for a period of eight (8) years after commencement of program test authority by WYOW (i.e. January 4, 1997).

b. Renewal provisions: The TBA may be renewed at Shockley's option for an additional eight (8) year term upon notice of renewal to Northwoods on or before expiration of the initial term. Should Shockley fail to provide such notice, renewal shall automatically occur until such time as Shockley terminates the option term by notice to Northwoods.

6. Percentage of brokered station's weekly broadcast hours brokered to the brokering station:

Shockley is currently brokering more than 90% of WYOW's weekly broadcast hours, subject to the reservation by Northwoods of up to three hours per week to provide non-entertainment programming designed to meet the needs of the local community and to the right of Northwoods to pre-empt Shockley's programming in case of emergency or for programming which, in the good faith of Northwoods, is of greater local or national public importance.

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7. Network ownership or affiliation of brokering and brokered stations:

Stations WAOW-TV and WYOW are both primarily affiliated with the ABC broadcast television network and secondarily affiliated with the Fox television network.

8. Reported Nielsen all-day audience share (9 a.m. - midnight) for the brokering and brokered stations during the three most recent rating periods.

Attached hereto (Ex. 1) is a copy of Nielsen data showing the audience share for WAOW-TV for the last three rating periods. The attached data for the May 1997 rating period also shows information for "WAOW+", which reflects the combined audience share for WAOW-TV and WYOW. There is no Nielsen data available solely for WYOW for this period. In addition, WYOW commenced operations in January 1997; therefore, Nielsen data is not available for the station for the February 1997 or November 1996 rating periods. The attached information (Ex.1) is summarized as follows:

May 1997 Nielsen Rating Period

<u>Station</u>	<u>Audience Share</u>
WAOW-TV	19%
"WAOW+"	20%

February 1997 Nielsen Rating Period

<u>Station</u>	<u>Audience Share</u>
WAOW-TV	21%

November 1996 Nielsen Rating Period

<u>Station</u>	<u>Audience Share</u>
WAOW-TV	28%

9. Summary of other relevant data.

As noted above, the subject TBA between Shockley and Northwoods was

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executed on May 9, 1996, at which time the initial construction permit application for WYOW was pending (File No. BPCT-950912KE). That application was granted on September 30, 1996, and, in early January 1997, WYOW commenced program tests. Northwoods subsequently filed a license application for the station (File No. BLCT-970115KE), which is currently pending.

Station WYOW is located in the remote Northwoods area of Northern Wisconsin and is one of only two full-service TV stations serving the region. Thus, the TBA between Shockley, an established broadcaster in the market, and Northwoods has facilitated marketing and the provision of high-quality and essential programming to the Eagle River area, like critical and emergency weather information, "Wisconsin Newslink", including pertinent news and other stories from across the state, as well as local Eagle River and network coverage. In addition, Shockley recently obtained FCC authority to construct and operate two microwave relay facilities between WAOW-TV and WYOW, which will enhance the provision of programming to WYOW, pursuant to the TBA, and permit the provision of additional programming uniquely geared to Eagle River viewers. Thus, the subject TBA serves important public interest considerations.

Please direct all inquiries and communications concerning this matter to the undersigned.

Very truly yours,

*Howard J. Braun*  
*Diane L. Mooney*  
Howard J. Braun  
Diane L. Mooney

Enc.

cc: David D. Oxenford, Jr., Esq. (Counsel to Northwoods w/enc.)





